

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC

*Plaintiff,*

v.

CHARTER COMMUNICATIONS, INC.,

*Defendant.*

Civil Action No. 2:22-CV-00125-JRG

**JURY TRIAL DEMANDED**



**DECLARATION OF DARLENE F. GHAVIMI IN SUPPORT OF  
ENTROPIC COMMUNICATIONS, LLC'S  
MOTION TO STRIKE OPINIONS OF CHRISTOPHER BAKEWELL**

I, Darlene F. Ghavimi, declare:

1. I am a Partner with the law firm of K&L Gates LLP and counsel of record for Plaintiff Entropic Communications, LLC (“Entropic”) in the above-captioned matter. I submit this declaration in support of Entropic’s Motion to Strike Opinions of Christopher Bakewell. I have personal knowledge of the matters stated herein and, if called to testify to such matters, I could and would testify thereto.

2. On January 16, 2023, Entropic’s counsel met and conferred by video conference with counsel for Charter Communications, Inc. (“Charter”) to discuss the scope and relevance of Entropic’s document requests relating to damages. During this meet and confer, the parties discussed Entropic’s requests, including requests relating to whole home DVR. Entropic explained the relevance of whole home DVR to the claims and defenses of this case, including with respect to Entropic’s damages.

3. During the January 16, 2023 meet and confer, the parties discussed the scope of all of the requests, and with respect to Entropic’s document request numbers 37, 43, 47, 48, and 51, Entropic agreed to provide “a list of the features of the accused products and services as examples of the information we are seeking in these requests.” *See* Ex. A at 5. Attached as Exhibit A is a true and correct copy of correspondence between Entropic and Charter’s counsel between December 30, 2022, and January 30, 2023.

4. Entropic provided this information to Charter in an email on January 24, 2023. The email specifically identified the types of documents requested and explained the relevance of these documents as related to whole home DVR. *See* Ex. A at 2–3.

5. On January 30, 2023, Charter responded and agreed to search for the documents identified in Entropic’s January 24, 2023 email. Charter did not identify any documents it was

refusing to search for or produce, but stated that it did not understand the relevance of whole home DVR.

6. On February 10, 2023, the parties again met and conferred by video conference to discuss Charter's delay in producing documents relating to Entropic's damages requests. During that call, Entropic explained again the relevance of whole home DVR to Charter.

7. Charter did not raise the issue of relevance relating to whole home DVR with Entropic since that time.

I certify under penalty of perjury under the laws of the United States that the foregoing statements are true and correct. Signed this 11th day of September, 2023.

/s/ Darlene F. Ghavimi  
Darlene F. Ghavimi

**EXHIBIT A**

**FILED UNDER SEAL**